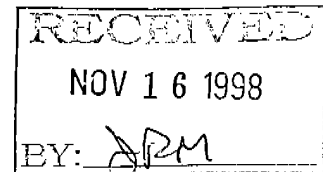


(OE) 004250



November 14, 1998

To: John Munn
California Department of Forestry
1416 Ninth Street
Sacramento CA 95814

To: Bruce Halstead
Fish and Wildlife Service
1125 16th Street, Room 209
Arcata CA 95521-5582

From: Linda Perkins for Albion River Watershed
Protection Association and Friends of Salmon Creek
PO Box 661
Albion CA 95410

Reference: PRT-828950 and 1157 and SYP 96-002

Dear Gentlemen:

Please consider these comments in making your decision on these documents.

Watercourse and Lake Protection Zones and Delivery of Road-related Sediment to Streams

The standards proposed for the protection of aquatic values are insufficient to maintain and enhance the beneficial uses of water, including the fish for whom an incidental take permit is being requested.

Indications are that for Class I and Class II streams a management zone for WLPZs in which there would be no timber harvest or other management activities (except some restricted road-related activities) should be a minimum width of 150 feet, or the top of the inner gorge, or the extent of unstable areas, or one site-potential tree, whichever is greater, distances to be measured horizontally from the channel migration zone [with equipment exclusion zones that increase to 250 feet if there is ground-based yarding of upland slopes, or in areas of slopes >50%]-

and a protection zone for Class III streams that is equal to 1/2 a site potential tree, 100 feet, or the extent of unstable areas, whichever is greater, measured horizontally; within 25 feet of the stream or to the extent of unstable areas no timber harvest or other management activity allowed; beyond this inner buffer retain 150 square feet of conifer basal area distributed over all size classes and leave no exposed soil after harvest and with EEZs increased to 250 feet under conditions described for Class Is and IIs above-

and within these protection and management zones for all three stream classes exclude equipment, allow no chemical treatments, no site preparation burning, no salvage logging of dead, down or dying trees, use full-suspension yarding, retain within the zones all trees damaged by logging-

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and that roads "in order to avoid take of coho salmon...must be constructed, reconstructed, maintained and operated such that road-related sediment does not reach watercourses, coho salmon movement is not restricted, the natural drainage network and hydrology are maintained, and forest chemicals do not come in contact with water"

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and to help effect this avoidance, that a National Marine Fisheries Service approved road management plan on a watershed wide basis be developed and implemented; that road inventory, monitoring and maintenance be done on an annual basis; that no new roads be opened within the above-delineated streams management and protection zones; that all existing roads within these zones be rocked; that no hauling or skidding in wet weather conditions (.25 inches in 48 hours) occur; that midslope or ridgeline temporary roads be built to the specifications of the *Handbook for forest and ranch roads: A guide for planning, designing, constructing, reconstructing, maintaining and closing wildland roads* by W.E. Weaver and D.H. Hagans, Mendocino County Resource Conservation District, 1994; and that temporary roads be closed promptly after timber harvests; and that existing roads and ditches be reconstructed as necessary to avoid interception and concentration of runoff to streams;

and that roads not be constructed on unstable slopes, slopes greater than 50% with no benches or in headwalls of defined channels; and that all roads and culverts should be inspected annually and any failures and blockages corrected;

and that culverts be inventoried and reconstructed so that they do not change channel beds, block sediment transport, or change the velocity of water; provide for passage of juvenile and adult salmon such that historic patterns are restored in salmon streams; that culverts be constructed or reconstructed to meet the criteria for 100-year storm events;

and water drafting for dust abatement or wildfire suppression meet NMFS screening, approach and sweeping velocity standards;

and that, if these practices, among others, were implemented that the impacts to aquatic species would be mitigated and minimized to the maximum extent practicable.

Has such a set of protection measures as outlined above been considered as an alternative to those proposed in the SYP/HCP?

Hardwoods

Has sufficient evidence of the current level of site occupation of hardwoods been presented, and standards proposed to retain hardwoods as a component of the species mix of the forest post harvest, and monitoring proposed to assure that this component of the forest is maintained to the degree that existing wildlife- listed and unlisted- is not significantly adversely impacted? Has it been established to what degree a hardwood component needs to be retained in order to support the woodrat which forms a large part of the prey base of the northern spotted owl such that the owl will not be significantly adversely impacted by loss of prey base?

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Sincerely,

Linda Perkins for ARWPA/FOSC